

## REMARKS

The Office Action dated March 24, 2004 has been received and carefully noted. The following remarks are submitted as a full and complete response thereto.

Claims 1-43 are pending in the present application. Claims 1, 6, 20-22, 26-28, and 34-43 are independent claims. No new matter has been added. Claims 1-19 and 21-43 having been allowed, claim 20 is respectfully submitted for consideration.

### Rejection of Claim 20 Under 35 U.S.C. § 102(e):

Claim 20 was rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,535,518 B1 to Hu et al. (Hu '518). This rejection is respectfully traversed.

Claim 20 recites a switch for a packet switched or frame switched network. The switch recited in claim 20 has conventional routing circuitry and the network has client devices and storage devices and a storage manager coupled to the switch. The switch includes one or more ports which are structured to operate to receive redirection commands from a storage manager containing old address data and new address data and to store the old address data and new address data contained therein in a shared look up table, but otherwise to function as conventional switch ports. The switch also includes shared redirection interface circuitry that is coupled to each of the ports and the shared look up table and coupled to the conventional routing circuitry. The shared redirection interface circuitry is structured to compare packet or frame type information included in a header of each packet or frame arriving from a port coupled to a client device or a storage device to determine if the packet or frame is of a type which is to be relabeled and

redirected, and, if the packet or frame is of a type to be relabeled and redirected, then the old address data therein is compared to the old address data in the shared look up table, and if there is a match to any of the old address data entries in the lookup table, the corresponding new address data is substituted from the look up table, and the packet or frame is forwarded to the conventional routing circuitry for routing.

Applicants point out that the above-discussed switch can advantageously minimize delays caused by the storage manager server and eases the burden on its memory, processing power, and independent data paths. As will be discussed below, Hu '518 fails to disclose or suggest the subject matter recited in claim 20 of the present application. At least for this reason, Applicants respectfully submit that Hu '518 fails to provide at least the unobvious advantages of the claimed invention discussed above.

Hu '518 discloses, at least in the title thereof, a “system for bypassing a server to achieve higher throughput between [a] data network and [a] data storage system”. In Figure 8, Hu '518 discloses routing control (CU) 100 and switching element (SE) 101, which together make up a network server bypass device, Storage A (or SAN) 110, Server 120, Network 130, and Storage B 121. Hu '518 also discloses that the “software on the server will communicate with the [network server bypass] device for all necessary setup . . . and then pass the control to the device and notify the storage to start a response to that request with a given file ID” (column 8, lines 46-51).

However, even assuming, strictly for the sake of argument, that the network server bypass device and server disclosed in Hu '518 are analogous to the “switch” and “storage

manager” recited in claim 20 of the present application, respectively, Applicants respectfully submit that Hu ‘518 nonetheless fails to disclose or suggest at least the “one or more ports which are structured to operate to receive redirection commands from a storage manager containing old address data and new address data”, recited in claim 20 of the present application.

As discussed above, Hu ‘518 discloses a server that communicates with a network server bypass device, and that then passes control to the device. However, Hu ‘518 fails to disclose or suggest at least that the server disclosed therein sends redirection commands to the device recited therein, wherein the redirection commands control old address data and new address data. Rather, as disclosed on lines 52-58 of column 8 of Hu ‘518, the server allows the device to interact directly with the storage disclosed therein, to add http headers, and to perform TCP/IP protocol conversions directly. In other words, the server disclosed in Hu ‘518 never sends the “redirection commands” recited in claim 20 of the present application.

At least in view of the above, Applicants respectfully submit that Hu ‘518 fails to disclose or suggest the subject matter recited in claim 20 of the present application. Therefore, Applicants further submit that claim 20 is patentable over Hu ‘518 at least for the reasons discussed above.

At least in view of the above remarks, reconsideration and withdrawal of the rejection of claim 20 under 35 U.S.C. § 102(e) as being anticipated by Hu ‘518 is respectfully requested.

Allowable Subject Matter:

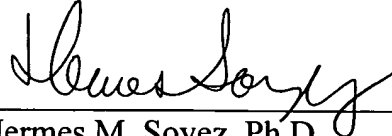
Applicants thank the Examiner for allowing claims 1-19 and 21-43.

Applicants respectfully submit that all of the comments included in the Office Action have been addressed and that the rejection included in the Office Action has been overcome. Hence, Applicants respectfully further submit that, at least in view of the above, claims 1-43 of the present application contain allowable subject matter. Therefore, it is respectfully requested that all claims pending in the present application be allowed, and that this application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the Applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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